

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

	x	
UNITED STATES OF AMERICA	:	15 CR 379 (PKC)
	:	
v.	:	
	:	Attorney Affidavit
JUAN ORLANDO HERNANDEZ,	:	
	:	
Defendant.	:	
	x	

I, Sabrina Shroff, Esq., hereby declare under the penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I respectfully submit this Affidavit as ordered by the Court on August 14, 2023 [ECF Docket No. 608]. Specifically, the Court ordered that I “file an affidavit identifying [1] all physical locations in which the classified submission was drafted, [2] on what dates it was drafted, [3] the identity and clearance status of any person or persons reviewing, revising, editing or otherwise seeing any portion of the classified submission and [4] specifically identifying the person typing the words ‘[Sabrina go back and check to see if you want to add anything].’” *Id.*
2. In addition to filing this Affidavit with the Court, I have spoken to Court Information Security Officers (“CISOs”) Daniel Hartenstine and Matthew Mullery regarding the facts set forth herein. I have omitted providing the Court with one fact at their direction.
3. On August 9, 2023, I submitted an *ex parte* classified filing with the Court (the “Classified Submission”). It did not contain page numbers and contained the referenced note to self. The Classified Submission was filed in this manner because I was having computer issues with the classified laptop provided to me in the secure room -- issues I contemporaneously mentioned to CISO Mullery when I spoke to him during the course of my work in the secure room. Because of the computer issues, and the time crunch I was facing in submitting the Classified Submission to the Court, I submitted it as is.
4. The only physical location in which the Classified Submission was drafted was in the room designated as a secure room for this case by the two CISOs. I intentionally omit here the location of the secure room.
5. The Classified Submission was drafted between July 17, 2023 and August 9, 2023. I did not memorialize the specific dates in that date range in which I drafted the Classified Submission in the secure room.
6. I was the only person who reviewed, revised, edited, or otherwise saw any portion of the Classified Submission before I submitted it to the Court.
7. I was the one who typed the words: “[Sabrina go back and check to see if you want to add

anything]”. It was a note that I wrote to myself as part of the drafting process.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: August 14, 2023

/s/SPS

Sabrina P. Shroff